

# PANGAEA

MARITIME LTD

Roseville, California

Date: 01/06/2015

To: M/s.

Environmental Protection Agency,  
Office of Civil Enforcement: Air Enforcement Division,  
Marine ECA – Fuel Oil Non – Availability  
1200 Pennsylvania Ave N.W.,  
Ariel Rios South Building, Mailcode 2242 A  
Washington D.C. 20460

Dear Sirs,

REF: FONAR ECA0100 – MV Aquila

Further to the completed ECA0100 FONAR Form, herewith a summary of the events leading to non-compliant fuel on board for the forthcoming call to the North American ECA area.

- (a) 2<sup>nd</sup> December: The vessel was fixed to load a cargo of 54000 mts of steel slabs from Praia Mole to Los Angeles.
- (b) In view of the quantity to be loaded the vessel's voyage routing was calculated as Departure Itaguaí, Brazil (where the last cargo was being discharged) to Praia Mole, Brazil (where the steel slabs was loaded) via Magellan Straits direct to Los Angeles.
- (c) Completion and departure Itaguaí 12/06/2014; ETA Praia Mole 12/09/2014 PM; ETB Praia Mole 12/13/2014; ETC/D Praia Mole 12/16/2014 PM; ETA Magellan Straits 12/25/2014; Departure Magellan Straits 12/26/2014; ETA Los Angeles 01/14/2014.
- (d) Bunkers for the whole voyage was supplied at Praia Mole and various efforts were made to also stem LSMGO (0.1 pct Sulphur) to enable comply with the North American ECA regulations coming into effect 1<sup>st</sup> Jan 2015. However Petrobras the only oil company in Brazil manufacturing and supplying Marine Fuels (both IFO and MDO) advised that they had no intention to manufacture the required products at least at that point. We quote below the reply from Petrobras:

**Da:** [cristina@petrobras.com](mailto:cristina@petrobras.com) [<mailto:cristina@petrobras.com>]

**Inviato:** lunedì 15 dicembre 2014 13:17

**A:** Susanna Mutascio Riviera Marine

**Oggetto:** Re: I: BRAZIL IFO LS 0.1%, MGO LS 0.1%



Pangea Maritime Ltd - POB 556, Main Street, Charlestown, St. Kitts & Nevis.



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yes, but I cannot answer at the moment,  
so far we will not do either products.

Regards,  
Ana Rossetto  
Cristina Green

Petrobras Europe Limited  
4th floor,  
20 North  
Audley  
Street  
London W1K 6WL  
Tel: 020 3073 0790  
Fax.: 020 3073 0781

Unquote..

- (e) The fuels on board the MV Aquila and the sulphur contents are as follows: IFO HS with max sulphur of 0.66 pct received at Praia Mole / IFO LS with max sulphur of 0.98 pct received at Balboa / and MDO with max sulphur of 0.48 received at Singapore.
- (f) - Lat / Long of where entry will be made to the ECA area - 32-37.3 N / 117-49.1 W;  
- Lat / Long of where entry will be made to the California waters - 32-47.8 N / 117-52.4 W;  
- Distance between entry to ECA area and entry to California waters 10.0 nm;  
- Estimated date of entry to the ECA area - 13.01.2014 WP, AGW, UCE;  
- Estimated steaming time through the ECA area till reaching California 24 miles limit - abt 45 minute;  
- Estimated LS (0.1 pct Sulphur) MGO consumption till reaching California 24 mile limit - abt 0.8 mt;  
- Estimated steaming time from California limit till Los Angeles - 5 hrs;  
- Estimated consumption through California waters -5.6 mt.
- (g) Compliant Bunkers has been stemmed at Los Angeles for delivery to the vessel on arrival Los Angeles and the suppliers are M/s. Chemoil.

We thank you in advance.

Best regards,



(Sumit K. Bose)

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As agents for and on behalf of Pangea Maritime Ltd.  
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E Mail: chartering@fairwayfreights.com.

**FAIRWAY FREIGHT**  
**as agents only**  
**for and on behalf of**  
**PANGAEA MARITIME LTD.**



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